

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF TENNESSEE**  
**AT KNOXVILLE**

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 3:20-CR-00021
	)	
ANMING HU	)	
	)	

**MOTION TO CONTINUE**

Now comes the Defendant through Counsel and moves this Honorable Court for a Continuance of the Motion cutoff date and the Trial.

The Motion cutoff date is presently March 31<sup>st</sup>. Dr. Hu requests that the Defendant's deadline for filing motions be extended to at least May 4<sup>th</sup>, 2020.

The Defendant believes an extension of the motion deadline will require a corresponding extension of the trial date.

The Government has been advised of this motion and has no objection to the requested continuance.

There are several novel and unique issues in this case. The complexity in the Indictment requires considerable research and, additional time is necessary to ensure a fair trial. In addition, the Government has filed a Classified Information Procedures Act notice requesting a hearing. This procedure will require a hearing and, additional motion practice may be required after the hearing. The present restrictions on public gatherings caused by the corona virus may also play a factor in the timing of this case.

The Defendant is aware of his rights to a speedy trial however, the Government has no objection and both the Defendant and Government agree that the ends of Justice served by a continuance outweigh the interests of the Public and the Defendant in a

speedy trial.

Respectfully submitted this 27th day of March, 2020.

s/A. Philip Lomonaco  
A. Philip Lomonaco, BPR#011579  
800 S. Gay Street, Suite 2610  
Knoxville, TN 37929  
(865) 521-7422  
(865) 521-7433 fax  
[apl@knox-law.com](mailto:apl@knox-law.com)

**CERTIFICATE OF SERVICE**

I do hereby certify that a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by U. S. Mail. Parties may access this filing through the Court's electronic filing system.

s/A. Philip Lomonaco